

**From:** Ho, Yenhung [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0373CF6F13A849F1BB61BB1D1B64F981-YHO]  
**Sent:** 11/16/2020 6:42:19 PM  
**To:** Rao, Kate [Rao.kate@epa.gov]  
**Subject:** TDM re. CES

Hi Kate, here is another TD for CES. Please issue it Cadmus if it looks good to you. Thanks. Calvin

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**Contract No. EP-C-15-022, Workplan Assignment No. 5-90**  
**R9 Tech Support for Implementation of the UIC Program – Clean Energy Systems - Class VI UIC Permit Application # R9UIC-CA6-FY20-1 [Task 1; Subtask 1.2 – Technical Review Analysis]**

#### **Technical Direction**

**Background:** On October 1 and 7, 2020, EPA provided CES with technical evaluation comments on the emergency and remedial response plan and financial responsibility demonstration information, and on the operating procedures and AoR delineation modeling submitted as part of the permit application, respectively. On November 2 and 6, 2020, CES provided responses to the EPA's comments.

**Action:** Under Task 1, SubTask 1.2, review and provide an evaluation of 1) the below sub-set of CES's 11/2 responses, and 2) the entirety of CES's 11/6 responses. If the responses do not provide sufficient information, please provide evaluation and discussion under this technical review TDM.

#### Emergency and Remedial Response Plan (ERRP)

- The Risk Register
- The updated ERRP (Note that CES highlighted all updates/changes to the document in yellow)
- Response to comments on the staff training and excise procedures, including the relevant documents in appendix

#### Financial Responsibility Demonstration

Note: CES doesn't have information on updated cost estimates for the identified FR activities and qualifying financial instruments.

**Deliverable:** Provide a technical analysis report evaluating CES's responses to EPA technical comments. The report should include an itemized list of additional information necessary to clarify, modify, or supplement the permit application material. Deliverable should be emailed in WORD to Kate Rao and Calvin Ho.

**Estimated LOE:** 50 hours

**Schedule:** 4 - 6 weeks from the Kick-off call.

**Kick-off Call:** Cadmus will set up a call with Calvin once TDM is received. Goal of call is to discuss the TDM, LOE, and due date of deliverable.

#### **Material to Review:**

- CES's Response to EPA Technical Review Comments #2 dated October 31, 2020 (CES has provided to Cadmus with a copy of Response #2 with CBI on November 9, 2020)
- CES's Response to EPA Technical Review Comments #3 dated November 6, 2020 (A copy of CES Response #3 is available in GSDT)

